From: John Buckley
To: Tom Infusino

Cc: <u>Daum, Theodore@DWR</u>

Subject: Re: CPC Comments on the DPRP for IRWMPs

Date: Monday, October 21, 2013 2:23:42 PM

October 21, 2013

From John Buckley, executive director Central Sierra Environmental Resource Center P.O. Box 396 Twain Harte, CA 95383

## To Tom Infusino: cc: Ted Daum

## Dear Tom:

Thank you for sharing your thoughtful comments submitted to Ted Daum for consideration. As a six-year-long participant in the neighboring Tuolumne-Stanislaus IRWM planning process, I appreciate the overall focus of your comments and one key point in particular.

In our Tuolumne-Stanislaus IRWM, project applicants and supporting IRWM members painstakingly assessed how projects related to State objectives, IRWM goals, and all the other various requirements. But the question of to what degree any specific IRWM proposal is tied to a truly collaborative, multi benefit approach was an issue that had a greater level of importance to some IRWM participants than to others. It is not clear that the State prioritizes a truly significant amount of collaboration in one IRWM over a lower, less openly collaborative governance or decision-making process in another IRWM. There is no clear measurement metric to evaluate the degree of collaboration that goes into an IRWM Plan or the packaging of projects for funding.

As an example of how that may matter at the local IRWM level, a truly diverse assemblage of interests in our process engaged over many years to complete the Tuolumne-Stanislaus IRWM Plan. But over those years of meetings, the original decision-making process of full consensus was altered and replaced by a majority vote process that ended up as the final decision-making threshold. Now the new Tuolumne-Stanislaus IRWM governance process appears to be headed for a JPA where only certain utilities and political bodies actually will have the real decision-making votes or authority. All non-government organizations and other interests will still be allowed to be part of an advisory WAC process, but it appears that final decisons will be approved in the JPA by a number of utility districts and some local elected politicians.

That may still provide reasonable outcomes in most situations, but if a competing IRWM utilized full collaboration that truly allowed IRWM decisions to be decided by the broadest range of water interests, it would seem desirable for the State to prioritize a higher ranking for such a truly collaborative governance approach.

It seems positive for the State to have some clear criteria and evaluation to assess whether an IRWM does or doesn't have a truly "collaborative multi-benefit approach to selection and design of projects and programs." Thank you for raising this point

with DWR.

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